U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Montco Research Products Inc Removal - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #11**
Montco Research Products Inc Removal
04J7
Palatka, FL
Latitude: 29.6701931 Longitude: -81.7917216

To: James Webster, USEPA R4 ERRPPB
Sam Graves, FLDEP

From: Courtney Swanson, FOSC
Date: 6/16/2022
Reporting Period: 6/6/2022 - 6/17/2022

1. Introduction

1.1 Background

Site Number:	04J7	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	3/23/2022
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	10/12/2020	**Start Date:**	10/12/2020
Demob Date:		**Completion Date:**	
CERCLIS ID:	FLD061897054	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

1.1.2 Site Description

The Site is a commercial/industrial property of approximately 31.7 acres in size located in a rural area of Putnam County. The Site was a chemical manufacturing facility that ceased operations in 2018 due to a fire at the facility in June 2018. The Site includes, but is not limited to, a production building, vacuum pump area, reactor area, tank farm, office building, two storage/warehouse buildings, a residential building, and several small utility/storage structures. The facility previously produced three chemical intermediate products in batch processes, including chloromethyl-napthalene (CMN), ethylbenzyl chloride (EBC), and alphanapthalide (ANA). From June 2018 until November 2019, the Florida Department of Environmental Protection (FDEP) worked with the facility's owner and the facility's operator, Montco Research Products, Inc., to remove remaining wastes and other materials from the Site. The Site was referred to the U.S. Environmental Protection Agency by FDEP in November 2019 for evaluation for a possible Time Critical Removal Action. According to FDEP's November 2019 referral checklist, 20,000 gallons of spent hydrochloric acid, 185,660 gallons and 78,000 pounds of spent zinc chloride, 11,800 gallons of used naphthalene, and 3,750 gallons of spent ethylbenzene remain on Site.

1.1.2.1 Location

The Site is located at 209 Janice Drive in Palatka, Putnam County, Florida. The Site is situated at the eastern terminus of a dirt road in a rural area of Putnam County. The Site is bounded on the north, south, and east by undeveloped forest and wetlands, including Rice Creek Swamp and Rice Creek, a tributary of the St. John River. The area to the west of the Site consist of low density residential properties.

1.1.2.2 Description of Threat

Large quantities of hazardous waste, including strong acids and flammables, are stored on site in approximately 800 drums and barrels and approximately 75 large (1,000 to 20,000 gallon) containers (tanks, reactors, and condenser vessels)

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

In November 2019, FDEP requested that the EPA evaluate the Site for a possible Time Critical Removal Action. On November 20, 2019, the EPA conducted an initial Site Inspection. Also present at the time of the inspection were representatives of FDEP and the owner/operator of the facility. In the course of conducting the initial Site Inspection, the EPA OSC observed four large (2,000 - 4,000 gallon) vessels leaking materials into containment areas as well as four bulging, fire-damaged drums and stained concrete and distressed vegetation in areas downgradient of the storage tanks and process vessels. The EPA OSC initiated an Emergency Response in order to stabilize the drums and remove materials from the leaking vessels. Field measurements made during the initial Site Inspection and during the Emergency Response, as well as information provided by the owner/operator and a facility employee, indicated that materials stored in, and leaking from, several of the large vessels were hazardous substances. Material leaking from two vessels were found to be corrosive (one indicated a pH of ~13, the other ~1). The third leaking vessel reportedly contained ethylbenzene, an ignitable substance. The fourth vessel reportedly contained used

hydraulic oil contaminated with hydrochloric acid. Conflicting accounts were provided by a facility employee as to the contents of the bulging, fire-damaged drums. Given the confusion concerning the drums contents and the destruction of any labels that may have been affixed to them due to the June 2018 fire, the drums were treated as containing unknown materials. Private water supply wells at two nearby residential properties were sampled concurrently with the Emergency Response. Samples were analyzed for semivolatile organic compounds, volatile organic compounds, inorganic anions, pH, and metals. None of the analytes were present in either sample at levels above the values established by the EPA Drinking Water Standards and Health Advisories (EPA 822-F-18-001) promulgated by the EPA Office of Water, except that iron was present in one sample at a level that exceeds the Secondary Drinking Water Regulation.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On October 12th ERRS and START contractors, as well as the EPA OSC, mobilized to the Site for the purpose of conducting hazard categorization and obtaining volume estimates for the contents of approximately 800 drums and barrels and approximately 75 large (1,000 to 20,000 gallon) vessels.

2.1.2 Response Actions to Date

Beginning on October 12th,ERRS staged all drums and barrels in order to allow access during sampling. Access points for all of the large vessels were identified and, if necessary, bolts were loosened. Samples were then taken from all drums, barrels, and large vessels for hazard categorization and hazard categorization tests performed. All sampling was conducted in level B or C PPE and hazard categorization was conducted in level C.

Water within an unroofed containment area was found to have a low pH (approximately 2 - 2.5). The water within that and a second containment area was transferred by vacuum trailer and disposed of at Water Recovery Inc's facility in Jacksonville Florida.

While clearing out a small lab space which the facility previously used for quality control analysis, a mercury spill was discovered. The spill was small, probably 10-15 ml. The lab space, an adjoining office, and the corridor between were evacuated and sealed off. The rest of the building in which the mercury spill had occurred consists of a single large room with large open doorways previously used as a maintenance shop. Mercury vapor readings inside the maintenance bay were taken with a Lumex 915 and compared to the OSHA PEL (0.1 mg/ cu m). No detections above 200 ng/cu m (0.0002 mg/cu m) were made. ERRS personnel removed the spilled mercury and placed it in a flask for disposal. Several other small containers of mercury (totaling approximately 30 lbs) were also found in the lab space.

On or about March 18, 2021, ERRS personnel were present on site for the purpose of obtaining representative samples of several waste streams in order to submit them to bidders on the disposal contract. At that time ERRS personnel observed material leaking from an approximately 3,000 gallon poly tanks into an unroofed secondary containment area. ERRS was directed to transfer the material from the tank into poly totes that had been staged on the site during previous deployments and to transfer the poly totes to a warehouse building with adequate secondary containment. Approximately 3,000 gallons of material believed to be ethyl-benzene was transferred.

On May 25, 2021, ERRS, START and EPA personnel mobilized to the Site to commence waste bulking and disposal operations. During the week of May 25th, valves and fittings were replaced on two empty tanks in order to utilize them as bulking and settling vessels. Additionally, equipment and an office trailer were delivered to the Site during the week of the 25th. Waste disposal shipments commenced during the week of the 25th as well, with approximately 4,000 gallons of bulk acidic liquid transported from the Site during the reporting period.

During the period of May 30th to June 12th, bulking and removal operations continue at the Site. Drums containing bulk acid waste were pumped and transferred to the large tanks and other vessels containing compatible wastes and disposal tankers were direct loaded from the large vessels. During this period it was discovered that one of the large acid tanks had been compromised and rainwater inside the secondary containment area was contaminated with acid.

During the period of June 13th to June 25th, bulking and disposal operations continue at the Site. Drums containing bulk acid waste and neutral liquids were transferred to large tanks and other vessels containing compatible wastes and disposal tankers were direct loaded from the large vessels. The secondary containment area where the breached acid tank is located required extra attention in order to prevent overflow of the containment area during frequent rain storms.

During the period of June 13th to June 25th, the ERRS contractors disposal coordinator was informed that the facility contracted to receive the bulk combustible acidic liquids would be unable to do so in a timely manner and that we would be required to pay a daily storage charge for wastes shipped off-site. The existing disposal contract was cancelled and the waste stream is presently being re-bid.

During the period of June 26th to July 4th, the ERRS contractors contractors continued to consolidate liquid wastes from drums into tanks and other large vessels to facilitate loading of tankers for offsite disposal and to direct load tankers for offsite disposal. Additionally, small quantities of various chemicals used in the on-site quality control lab were placed into a lab packs and removed for disposal during this reporting period.

ERRS crew demobilized from the Site on July 14th due to an inability to ship remaining wastes.

The ERRS crew mobilized to the Site on April 21st, 2022. The Site was cleared of overgrown vegetation and equipment was staged to begin treating and disposing of the remaining waste streams.

During the Week of April 25th, rainwater was removed from open topped drums containing solid wastes and commingled with the acidic liquid waste stream for neutralization. Additionally, tanks were prepared for the neutralization of bulk acidic liquids.

During the week of May 2nd, bench scale testing of the acid neutralization process was performed and the resultant liquid waste was sent for analysis to confirm that it could be profiled as a non-hazardous waste. Additionally, empty 55 gallon steel drums and poly barrels were crushed and staged for disposal as non-hazardous solid waste.

During the period from May 9th through June 3rd, confirmation that neutralized acid waste would be amenable to treatment and could therefore be shipped as non-hazardous was received. Large scale neutralization of bulk acidic wastes was commenced. During this period approximately 11,000 gallons of acidic waste was neutralized and prepared for disposal. Remaining drummed acidic liquids were commingled with the acidic liquid waste stream for neutralization. Empty drums and poly barrels were crushed and placed in lined roll-off containers and transported for disposal.

During the period from June 6th through June 17th, large scale neutralization of bulk acidic liquids continued. The neutralization process was slowed due to mechanical problems with the diaphragm transfer pumps. During this period approximately 5,000 gallons of bulk acidic waste was neutralized and 16,000 gallons of neutralized waste was shipped to Water Recovery Inc. for disposal.
2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
Low pH water	water accumulated in containment areas	53,322 Gal			Water Recovery Inc.
Bulk acidic liquid	HCl and ZnCl (aq) stored in fiberglass tanks and barrels	~130,000 Gal	Various		Vickery Environmental Inc.
Neutral liquids	Mineral salts stored in numerous drums and one large tank	~6,000 Gal	17862		Liquid Environmental Solutions Inc.
Lab Pack	Small quantities of various chemicals used in on-site QC lab		various		
Solid Waste	Empty drums and poly-barrels	~160 cubic yards	various		Waste Connections St. Cloud
Neutral liquids	Neutralized bulk acidic waste	~16,000 gallons	various		Water Recovery Inc.

2.2 Planning Section

2.2.1 Anticipated Activities
Disposal of bulk flammable liquids is anticipated to begin during the week of June 20th.

2.2.1.1 Planned Response Activities
Waste neutralization and disposal operations are continuing.

2.2.1.2 Next Steps

2.2.2 Issues

2.3 Logistics Section
No information available at this time.

2.4 Finance Section

2.4.1 Narrative
A Fund lead action memo was signed on August 6, 2020 establishing a total ceiling for the removal action of $1,686,000.00.

A Fund lead ceiling increase was signed on March 23, 2022 establishing a new ceiling for the removal action of $3,534,000.00.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$2,750,000.00	$1,880,000.00	$870,000.00	31.64%
TAT/START	$195,000.00	$0.00	$195,000.00	100.00%
Intramural Costs				
USEPA - Direct	$70,000.00	$25,000.00	$45,000.00	64.29%
Total Site Costs	$3,015,000.00	$1,905,000.00	$1,110,000.00	36.82%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost

accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.